

Addressing	
From	To
Kathleen Goforth/R9/USEPA/US	Gary Sheth/R9/USEPA/US@EPA
CC	BCC
Philip Woods/R9/USEPA/US@EPA Doug Eberhardt/R9/USEPA/US@EPA	
Description Form Used: Memo	
Subject	Date/Time
Fw: AZ Triennial Review Updated	10/13/2006 01:59 PM
# of Attachments	Total Bytes
1	55,949
NPM	Contributor
	Elizabeth Goldmann
Processing	
Comments	

Body

Document Body

Gary (and Phil)-
Thanks for this summary. What's the status of the triennial review? Has ADEQ held (or scheduled) a hearing on it yet? If so, please let me know the date and outcome, for tracking purposes (we report triennial reviews in WATA). Have you submitted comments? If so, please send me a copy.

NonResponsive Record

Thanks,
Kathy

Kathleen Martyn Goforth
Water Quality Standards Coordinator / ESA Coordinator
CWA Standards & Permits Office
EPA Region IX (WTR-5)
75 Hawthorne Street
San Francisco, CA 94105
(415) 972-3521

----- Forwarded by Kathleen Goforth/R9/USEPA/US on 10/13/2006 01:44 PM -----

Philip Woods/R9/USEPA/US@EPA

Sent by: Philip Woods

09/26/2006 02:49 PM

To Gary Sheth/R9/USEPA/US@EPA
cc Kathleen Goforth/R9/USEPA/US@EPA, Suesan
Saucerman/R9/USEPA/US@EPA

A few comments:

NonResponsive Record

5) The removal of numeric turbidity standards for OAWs is a real current issue which I think you have covered well. A parallel issue is the removal in the 2002 standards of turbidity numbers for other state waters. FWS objected as part of their ESA consultation, and I believe we said something in our approval letters. ADEQ staff initially proposed a fix using the recent Oregon turbidity standards as a model. That fix is no longer visible in ADEQ's draft. (This topic is mentioned in Changes Initially Proposed 5))

NonResponsive Record

Changes Not Proposed: 1) Although EPA approved the removal of chronic numbers applicable to ephemeral waters in 2002 after AZ clarified its definition of ephemeral waters, we now recognize that was a mistake. (AZ's basis was that true ephemeral streams do not flow as long as four days.) Information that is now clear supports the need to have chronic numbers to protect A&W in ephemeral streams because the aquatic community in these streams is far more permanent than four days and is not obviously less sensitive to toxics than other better studied invertibrates. Also, there is the concern for downstream aquatic life esp from bioaccumulative toxics. One non-biological side-effect is that other states (eg, New Mexico) are proposing to copy AZ's example. (EPA approved AZ, why not us?) One remediation scenario that has been proposed is the general obligation of the state to examine the sufficiency of its criteria to protect beneficial uses in its waters during each triennial review.

(b) (5)

Gary Sheth/R9/USEPA/US

Gary Sheth/R9/USEPA/US

09/25/2006 09:16 AM

To Doug Eberhardt/R9/USEPA/US@EPA
cc Philip Woods/R9/USEPA/US@EPA, Kathleen
Goforth/R9/USEPA/US@EPA
Subject: AZ Triennial Review Updated

Here is an updated version, with some minor changes.

-- Gary



AZtriennialreview09-25.doc